

REMARKS

The Office Action dated August 23, 2005 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

The above amendments to 20, 22, 25, and 26, and the following remarks are submitted as a full and complete response thereto. It is noted that independent claim 20 has been amended to further clarify the recitations provided therein and further defining the scope of the claim. Independent claims 25 and 26 have been amended incorporating allowable subject matter included in claim 30, which has been cancelled, without prejudice or disclaimer. No new matter is being presented, and approval and entry are respectfully requested.

At the outset, claims 23 and 31-32 stand allowed. Claims 20, 21, 24-29, and 33 stand rejected and claims 22 and 30 stand objected to. Per the telephone conference conducted with Examiner Harper on September 12, 2005, the status of claim 24 is hereby corrected to reflect that claim 24 stands rejected.

Claims 20-29 and 31-33 are pending in the present application.

REJECTION UNDER 35 U.S.C. § 103(a):

In the Office Action, at page 2, claims 20-21 and 26-29 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,237,571 to Cotton et al. ("Cotton") in view of U.S. Patent No. 5,568,476 to Sherer et al. ("Sherer"). The Office

Action took the position that Cotton and Sherer disclose all the aspects of claims 20-21 and 26-29. The rejection is traversed and reconsideration is requested.

Claim 20, upon which claims 21-25 depend, recites a method of sending packets between trunked network switches. The method includes identifying a trunked network switch comprising ports, an adjustable number of which are bundled as a trunk group; identifying a packet received from a source destined for a destination to be accessed through the trunk group, by checking a trunk bit in a lookup table; identifying an appropriate trunk port of the trunk group on which to send the packet to the destination. The identifying of the appropriate trunk port comprises identifying a trunk group identification in a lookup entry, determining a trunk port index based upon the rules tag, and applying the trunk group identification and the trunk port index to a trunk group table to identify the appropriate trunk port for communication. The method further forwards the packet to the destination on the appropriate trunk port.

Claim 26, upon which claims 27-33 depend, recites a system for sending packets between ports on trunked network switches. The system includes a first switch having a plurality of communication ports, a second switch having a plurality of communication ports, a trunk connection between the first switch and the second switch, wherein the trunk connection comprises an adjustable number of ports, and a sending unit for sending a packet from a first port of the first switch to a second port of the second switch. The system also includes an ingress unit in the first switch for receiving the packet from a source, and for performing an address resolution lookup on one of a source address and a

destination address of the packet based upon a lookup table, an identifying unit for identifying that the first switch and second switch are connected by the trunk connection by checking a trunk bit in the lookup table, and for identifying an appropriate trunk port of a trunk group on which to send the packet to a destination by determining a trunk port index based upon a rules tag in a matching lookup entry, and a forwarding unit for forwarding the packet to the destination on the appropriate trunk port.

As will be discussed below, the cited prior art of Cotton and Sherer fail to disclose or suggest the elements of any of the presently pending claims.

Cotton generally describes a line status broadcast system based on event broadcasting rather than status polling. See column 2, lines 18-29. An interface switch monitors the lines and determines when a change in a line status occurs. An outgoing switch port or a group of switch ports in Cotton, are associated with a LAC and are set at system initialization or dynamically thereafter when there is a physical reconfiguration in the system. See column 18, lines 13-16. An L bit in a destination port store (DPS) in each switch element indicates whether the switch port corresponding to the destination logical address code is the same switch element. See column 19, lines 11-16.

Sherer generally provides maintaining a link table with a table entry for each port in a hub. See column 9, lines 19-25. Bits in the table are defined with an M/CAST bit updated along with a TX-port number when a valid bit is being set. It is used when initiating a multicast packet transfer. See column 9, lines 31-34 and lines 50-53.

However, Cotton and Sherer fail to teach or suggest, at least, “wherein said identifying of the appropriate trunk port comprises identifying a trunk group identification in a lookup entry, determining a trunk port index based upon the rules tag, and applying the trunk group identification and the trunk port index to a trunk group table to identify the appropriate trunk port for communication,” as recited in independent claim 20 of the present application. Cotton and Sherer also fail to teach or suggest, at least, “an identifying unit for identifying that the first switch and second switch are connected by the trunk connection by checking a trunk bit in the lookup table, and for identifying an appropriate trunk port of a trunk group on which to send the packet to a destination by determining a trunk port index based upon a rules tag in a matching lookup entry,” as recited in independent claim 26. Cotton and Sherer are devoid of any teaching or suggestion that provides that the identification of an appropriate trunk port comprises identifying a trunk group identification in a lookup entry, determining a trunk port index based upon the rules tag, and applying the trunk group identification and the trunk port index to a trunk group table to identify the appropriate trunk port for communication. Cotton and Sherer do not provide a teaching or suggestion that a determination of a trunk port index may be based upon a rules tag in a matching lookup entry.

Instead, Cotton provides that a memory table is provided which contains routing information for each logical address code, where, by indexing into the destination port store by a logic address code, a controller can find the port or group of ports that should be used to forward the call to its destination. See column 11, lines 21-29. The contents

of the controller in-address register, the controller out-address register, and the destination port store of Cotton does not provide the recitations of the identification of the appropriate trunk port of the trunk group as recited in independent claims 20 and 26 of the present application. See column 17, line 24, to column 18, line 48 of Cotton. Similarly, Sherer is devoid of any description or suggestion pertaining to the identification of the appropriate trunk port of the trunk group as recited in independent claims 20 and 26 of the present application.

It is respectfully pointed out that independent claim 26 has been amended to incorporate allowable subject matter previously recited in claim 30.

Accordingly, a combination of Cotton and Sherer fails to teach or suggest all the recitations of independent claims 20 and 26. It is respectfully requested that independent claims 20 and 26 and related dependent claims be allowed.

In the Office Action, at page 3, claim 25 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Cotton, Sherer, and U.S. Patent No. 5,386,414 to Chou et al. ("Chou"). The Office Action took the position that Cotton, Sherer, and Chou disclose all the aspects of independent claim 25. Reconsideration is requested.

Independent claim 25 recites a method of sending packets between trunked network switches. The method includes receiving a packet from a source at a first port of a trunked network switch; identifying that the first switch includes ports, an adjustable number of which are bundled as a trunk group; identifying that the packet received from the source is destined for a destination which must be accessed through the trunk group,

by checking a trunk bit in a lookup table; identifying an appropriate trunk port of the trunk group on which to send the packet to the destination by determining a trunk port index based upon a rules tag in a matching lookup entry; and forwarding the packet to the destination on the appropriate trunk port. The step of identifying the trunk port for communication includes a step of applying trunking information to the trunk group table, and the trunk group table is modified to reflect trunk port failures.

Referring to independent claim 25, as previously set forth, Cotton and Sherer fail to teach or suggest, “identifying an appropriate trunk port of the trunk group on which to send the packet to the destination by determining a trunk port index based upon a rules tag in a matching lookup entry.” In addition, Chou generally describes a method that uses a trunk group table whose size is a function of the number of active trunks in the trunk group connecting two packet switches and uses information stored in a plurality of data fields of an internal protocol header of the packet switches, which uniquely identifies each call, to select trunks from the trunk group table. See column 3, lines 35-46.

However, similarly to Cotton and Sherer, Chou is silent as to teaching or suggesting that an identification of an appropriate trunk port of the trunk group on which to send the packet to the destination is performed by determining a trunk port index based upon a rules tag in a matching lookup entry. Accordingly, a combination of Cotton, Sherer, and Chou would fail to teach or suggest all the recitations of independent claim 25.

It is respectfully pointed out that independent claim 25 has been amended to incorporate allowable subject matter previously recited in claim 30.

In view of the foregoing, is it respectfully requested that independent claims 25 and 33 and be allowed.

CONCLUSION:


In view of the above, Applicant respectfully submits that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicant further submits that the subject matter is more than sufficient to render the claimed invention unobvious to a person of skill in the art. Applicant therefore respectfully requests that each of claims 20, 21, 22, 24-29, and 33 be found allowable and, along with allowed claims 23, 31, and 33, this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicant respectfully petitions for an appropriate extension of time.

Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,


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